



469769

InterOffice Memo

To: Dagmar Romano
From: Fred Campbell *FKC*
Date: July 15, 1992
Subject: Minutes of General Mills Meeting at Holiday
Inn Metrodome on July 9, 1992

The purpose of this memorandum is to summarize the main topics and issues that were discussed during the July 9 meeting. The meeting was attended by Dick Hagen and Bill Taylor, representing General Mills Inc. (GMI), Peter Sabee and Catherine Meuwissen, representing Barr Engineering Co. (Barr), Tom Alcamo, representing the U.S. Environmental Protection Agency (EPA), and Gary Eddy, Dagmar Romano, Pat Koshenina, and Fred Campbell, representing the Minnesota Pollution Control Agency (MPCA). The meeting began at approximately 1:30 PM and ended at approximately 2:45 PM.

The meeting was originally organized by Dagmar Romano, and Ms. Romano opened the meeting with a brief introduction. Barr was asked to provide a Site status update, and Peter Sabee responded with several key points: (1) The ground water contamination plume in the Glacial Drift aquifer has been reduced in size (i.e. narrowed) by the two pumpout systems; (2) Levels of trichloroethylene (TCE) contamination in the Carimona Member aquifer (Carimona) are still higher than the cleanup levels established by the Consent Order (27 ug/L); and (3) The pump test data for the Magnolia Member aquifer (Magnolia) show that the Magnolia pumpout system will be sufficient to capture the contamination in the Carimona.

Tom Alcamo brought up one of the main topics for discussion: the five-year review of the Site. He provided General Mills representatives with two different documents pertaining to the five-year review. Tom added that the documents list the procedures for such a review. Bill Taylor glanced at the procedures and expressed concerns about the substantial amount of time and money already invested by GMI during the Record Of Decision (ROD) review and comment period. Bill asked if there is a way to avoid such extensive time and money expenditures for the five-year review. Tom responded by saying that all data compiled for the ROD and Interim Closeout Report is pertinent and applicable to the five-year review. He indicated that the review would consider two general aspects of the Site: (1) Is a source area present and has it been remediated?; and (2) Is the ground water contamination plume contained and what is its status in the affected aquifers?

Several issues related to the five-year review were also discussed during the meeting. Tom said that the EPA is somewhat flexible regarding the timing of the five-year review. He pointed out that only one five-year review has been completed in the nation. The Interim Closeout Report indicates that the Site will be subject to a five-year review in 1993. Tom suggested that on a technical basis the review should have already been completed, however he acknowledged that other remedial actions are still being installed. It would be possible, Tom said, to postpone the review until some time after 1993, but it would not be possible to wait until 1997 for example, to conduct the review. Gary Eddy stated that the MPCA has a voice in selecting the timing for the five-year review. The meeting attendees discussed the timing of the review, and concluded that the review should allow a reasonable amount of time for the Magnolia pumpout system to operate so that the system and its effects on different aquifers can be properly evaluated. Fred Campbell suggested that two years of operational and monitoring data for the Magnolia pumpout system might be necessary to evaluate the system's effects. Thus, Fred felt that 1994

might be an appropriate time for a five-year review. Tom Alcamo said that he himself would have no problem with postponing the review until 1994, and indicated that he could probably convince his *management to postpone the review until 1994. Peter Sabee wanted to review the EPA procedures for the review before he expressed an opinion on the timing of the five-year review.*

Specific elements of the five-year review were briefly mentioned by Tom Alcamo, including some concerns regarding the data for vinyl chloride and the St. Peter Aquifer. Catherine Meuwissen told Tom that a total volatile organic compounds (VOCs) scan is performed annually on water samples from the monitoring network, and vinyl chloride is included in the scan. Tom acknowledged that this annual VOC scan should be sufficient. EPA's concern regarding the St. Peter Aquifer involves the monitoring data that show an apparent impact of the Site on the St. Peter. Tom cited TCE data from the monitoring well immediately downgradient of the Site, and indicated that these data imply that the Site has contaminated the St. Peter. Peter pointed out that the four St. Peter monitoring wells are not all screened at the same depth, and the well referenced by Tom (200) may be detecting an upgradient source of TCE. Fred asked Peter about depth-specific sampling that was previously conducted in well 200. Peter suggested that these data should be re-examined. Tom indicated that the EPA would take a close look at the St. Peter monitoring data during the five-year review.

Peter asked about future activities at the Site: those which would follow the completion of the five-year review. Tom said the potential problems in the St. Peter may require some future remedial action. Another issue Tom mentioned is the cleanup levels for TCE, since the EPA generally uses Maximum Contaminant Levels (MCLs) whereas the Consent Order uses a higher number. This issue will have to be resolved in order to determine when the pumpout systems can be shut down. The eventual shutdown of the Carimona system will also have to be considered, because the Magnolia system may be adequate to capture the plume in the Carimona and Magnolia Members. Peter explained some of the operational problems with the Carimona system.

CC: Gary Eddy, Peter Sabee, Bill Taylor, Tom Alcamo